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September 16, 2020

VIA CM/ECF

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Bo Mao, No. 1:19-cr-00392-PKC

Dear Judge Chen:

We represent the defendant, Professor Bo Mao, in the above-captioned criminal case. We write jointly on behalf of the Defendant and the Government to respectfully request an additional four-week adjournment of the date to file pre-trial motions. The resulting schedule would have the motions filed on October 16, 2020, responses filed by November 13, 2020, and replies filed by December 16, 2020.

We thank the Court in advance for its courtesy in this regard.

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

s/ Morris J. Fodeman
Morris J. Fodeman
Michael S. Sommer

THOMPSON & KNIGHT LLP

s/ Richard B. Roper, III
Richard B. Roper, III

Counsel for Professor Bo Mao

cc: All Counsel of Record (via CM/ECF)